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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

VALERIE GEORGE, as Administrator and
Personal Representative of THE ESTATE OF
RYAN GEORGE; VALERIE GEORGE and/or
TAJMAH BEAUCHAMP, as Legal
Representative(s) for Jaida George and Ryan
George, Jr.; VALERIE GEORGE, Individually;
DONALD GEORGE; and TAJMAH
BEAUCHAMP, Individually,

Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S
DEPARTMENT; BILL COGBILL; COUNTY
OF SONOMA; CALIFORNIA FORENSIC
MEDICAL GROUP, INC; JAMES LUDERS,
M.D.; MICHAEL E. DAGEY, R.N.; SUTTER
HEALTH; SUTTER MEDICAL CENTER OF
SANTA ROSA; EDWARD W. HARD, M.D.;
RICHARD FLINDERS, M.D.; JOSEPH N.
MATEL, M.D.; NORICK JANIAN, M.D.;
ANGUS MATHESON, M.D., and DOES 1
through 25, inclusive,

Defendants.

Case No. 3:08-cv-02675-EDL

ECF Case

**STIPULATION AND ~~PROPOSED~~
ORDER RE PRETRIAL CASE
MANAGEMENT DEADLINES**

JURY TRIAL DEMANDED

IT IS HEREBY STIPULATED AND AGREED by and among the parties hereto, through their attorneys of record, that the Stipulation and Order re Pretrial Case Management Deadlines dated February 9, 2010 (Doc #266), is further amended as follows:

1. TRIAL DATE

All parties have agreed to a trial commencing on January 24, 2011, an available date proposed by the Court. Accordingly, all intermediate case management deadlines will be extended by approximately 3 months.

2. EXPERTS

- a. All expert discovery, including depositions of experts, shall be completed no later than July 30, 2010.

3. MOTIONS

- a. The last day for hearing dispositive motions shall be September 21, 2010, 9:00a.m, without prejudice to motions being heard on an earlier date.
- b. The parties agree to file their dispositive motions at least 57 days before the noticed hearing date.
- c. Responsive papers to dispositive motions shall be filed 32 days before the noticed hearing date.
- d. Reply papers in support of dispositive motions shall be filed 21 days before the noticed hearing date.

DATED: April 7, 2010

SANFORD, WITTELS & HEISLER, LLP
Attorneys for Plaintiffs

By: /s/
Steven L. Wittels, Esq.

DATED: April 7, 2010

SPAULDING McCULLOUGH & TANSIL, LLP
Attorneys for Defendants
SONOMA COUNTY SHERIFF'S DEPARTMENT,
BILL COGBILL and COUNTY OF SONOMA

By: /s/

Terry S. Sterling, Esq.

DATED: April 7, 2010

TRIMBLE, SHERINIAN & VARANINI
Attorneys for Defendants
CALIFORNIA FORENSIC MEDICAL GROUP,
INC.; JAMES LUDERS, M.D. and MICHAEL E.
DAGEY, R.N.

By: /s/

Jerome M. Varanini, Esq.

DATED: April 7, 2010

LAFOLLETTE, JOHNSON, DEHAAS, FESLER
& AMES
Attorneys for Defendant
SUTTER MEDICAL CENTER OF SANTA ROSA

By: /s/

Larry Byron Thornton, Esq.

DATED: April 7, 2010

ROGASKI, PREOVOLOS, WEBER &
PATTERSON, LLP
Attorneys for Defendant
NORICK JANIAN, M.D.

By: /s/

Chester A. Rogaski, Jr., Esq.

SO ORDERED: _____

Elijah D. Lantz

U.S.D.M.J.

Dated: April 8, 2010